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### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

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### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETIES A SERVICE

In the Matter of Sequoyah Fuels Corporation and General Atomics	Docket No. 40-8027-EA Source Material License No. SUB-1010
(Gore, Oklahoma, Site	
Decontamination and	ASLBP No. 94-684-01-EA
Decommissioning Funding)	April 15, 1994

CHEROKEE NATION'S COMBINED RESPONSE TO SEQUOYAH FUELS
CORPORATION'S ANSWER IN OPPOSITION AND
N.R.C. STAFF'S RESPONSE TO CHEROKEE NATION'S APPLICATION
FOR ORDER ALLOWING INTERVENTION

COMES NOW the Cherokee Nation and submits this response to Sequoyah Fuels Corporation's Answer in Opposition and N.R.C. staff's response to Cherokee Nation's Application for Order Allowing Intervention.

Sequoyah Fuels calls into question the ownership of the bed of the Arkansas River by the Cherokee Nation. The N.R.C. staff is concerned that the Cherokee Nation's petition (1) has not adequately demonstrated an injury in fact; and (2) failed to allege adequate facts demonstrating that the result of these proceedings will adversely impact its interest.

In 1970 the United States Supreme Court ruled that the Cherokee, Choctaw and Chickasaw Nations uniquely hold title to the bed and banks of a navigable waterway, the Arkansas River as the

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Nation v. Oklahoma, 397 U.S. 620 (1970) and Cherokee Nation v. State of Oklahoma, 461 F.2d 674 (1972). The bed and banks of the Arkansas River have been held in trust by the United States since 1906 pursuant to 34 Stat., 136. There is no doubt whatsoever that these tribes are the beneficial owners of ninety-six (96) miles of Arkansas riverbed including that portion adjacent to Sequoyah Fuels plant site. The Cherokee Nation is the exclusive owner of the north bank of the river within 1/2 mile south of this plant at the point of its confluence with the Illinois River. Choctaw Nation v. Cherokee Nation, 393 F.Supp. 224, 246 (E.D. Okla. 1975).

The concern of the tribe that there is contamination of the bed and banks of the Arkansas is not speculative. Attached hereto is a letter from Curtis Canard, Cherokee Nation Office of Environmental Services dated September 24, 1992, explaining, inter alia, the results of EPA ground water monitoring tests on riverbed property at the confluence of the Arkansas and Illinois Rivers. These tests show significant levels of heavy metals, including barium, chromium, cobalt, copper, lead, vanadium, aluminum, nickel, beryllium, and zinc. Some contaminate levels are in excess of Superfund criteria for contamination and others exceed National Primary Drinking Water Standards. The test wells are located outside of the Sequoyah Fuels Corporation corporate boundary but within the near by riverbed. (See map attached) At least four of the wells run along the Arkansas riverbed. Recently completed cadastral surveys conducted by the Bureau of Land Management establish that the Cherokee Nation owns much of the riverbed in this immediate area. Unfortunately mapping of those surveys is not yet complete. Nevertheless, the natural flow of ground water in this area is to the west toward tribal property.

The Cherokee Nation by virtue of its property interests in the area, should be permitted to intervene in these proceedings regardless of its representational standing. Georgia Power & Light, LBP-91-33, 34 NRC 138 (1941). Since the Cherokee Nation has property interests in the area which have likely been adversely effected by the operation of the Sequoyah Fuels Plant, the tribe has standing to intervene on its own as a tribe. Vermont Yankee Nuclear Power Station, LBP-87-7, 25 NRC 116, 118 (1987).

The Cherokee Nation's ownership of this portion of the Arkansas riverbed is established. If Sequoyah Fuels Corporation does not do an adequate clean-up of the site and nearby tribal property it will remain contaminated. Groundwater run-off will continue to contaminate tribal property in the future. The health and care of tribal members who use the riverbed for hunting and fishing will be affected. The tribe will not be able to develop the property for its economic benefit if it remains contaminated. The tribe should be allowed to intervene to protect the health and safety of its members and its economic development interests in the property. The tribe unconditionally supports the October 15, 1993, order issued to Sequoyah Fuels Corporation and General Atomics. The tribe asserts that with this additional filling that it has

Sequoyah Fuels Corporation itself admits that "groundwater flows in a generally westward direction." See affidavit of John Dietrich dated December 3, 1993, paragraph 8, attached to Sequoyah Fuels Corporation's Answer in Opposition to NACE's Motion to Intervene, dated December 6, 1993.

demonstrated a nexus between the possible outcome of these proceedings and its interests.

The Cherokee Nation adopts the contentions of NACE that; (1) the N.R.C. has enforcement authority over General Atomics and (2) guaranteed decommissioning financing by General Atomics is required by N.R.C. regulations and is necessary to provide adequate protection to public health and safety, including the tribe's members, as well as the property interest of the tribe.

The tribe is concerned about the adequacy of funding for decommissioning efforts. The concerns of the tribe are the same as those described in the order from which Sequoyah Fuels now appeals. If decommissioning funding is inadequate, the Cherokee Nation will suffer an injury in fact.

dames Wilcoxen, OBA#9605

Wilcoxen & Wilcoxen

Attorney for Cherokee Nation

P.O. Box 357

Muskogee, OK 74402-0357 Telephone: (918) 683-6696

### CERTIFICATE OF SERVICE

I, James G. Wilcoxen, hereby certify that on the day of May, 1994, copies of the foregoing Response was served by Dirst class mail, on the following:

Administrative Judge James P. Gleason Chairman
The Atomic Safety & Licensing Board
U. S. Nuclear Regulatory commission
Washington, D.C. 20555

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Administrative Judge Thomas D. Murphy Atomic Safety and Licensing Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge G. Paul Bollwerk, III Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

The Office of the Secretary U. S. Nuclear Commission Washington, DC 20555

ATTN: Docketing and Services Branch (Original and two copies)

James G. Wilcoxen

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### CHEROKEE NATION

P.O. Box 948 . Tarricqueti. Okia. 74465 . (98450-067)

Wilma P. Mankiller Principal Chief

John A. Keicher Deputy Chief

September 24, 1992

Mr. Jim Wilcoxen 112 N. 5th Street Muskogee, Ok 74401

RE: GORE RIVERBED

Dear Mr. Wilcoxen;

The sampling process for the Site Investigation at Gore Riverbed is complete. The EPA Contract Laboratory Program has returned the sampling analysis data. Analysis data for the soil and sediment samples indicate no significant concentrations of contamination for either inorganic or organic. However, sampling analysis data for the groundwater (monitoring wells) revealed heavy metal contamination (inorganic) in five of the ten wells. Heavy metal constituents in these wells must the EPA Superfund criteria for contamination with background sample above the Contract Required Detection Limit (CRDL) and hit samples three times the background sample results. Although these contaminants are considered low concentration, some exceed the National Primary Drinking Water Standards (1974) and Proposed National Drinking Water Standards. Contaminants include barium, chromium, cobalt, copper, lead, vanadium, aluminum, nickel, beryllium, and zinc.

The following tables are a summary of the EPA/CLP data. Also included is a map showing the location of the monitoring wells where groundwater samples were collected. The approximate depth to groundwater for these wells was eight to twenty feet. Groundwater samples were collected in June of 1992.

Sincerely,

Curtis Canard,

Office of Environmental Services

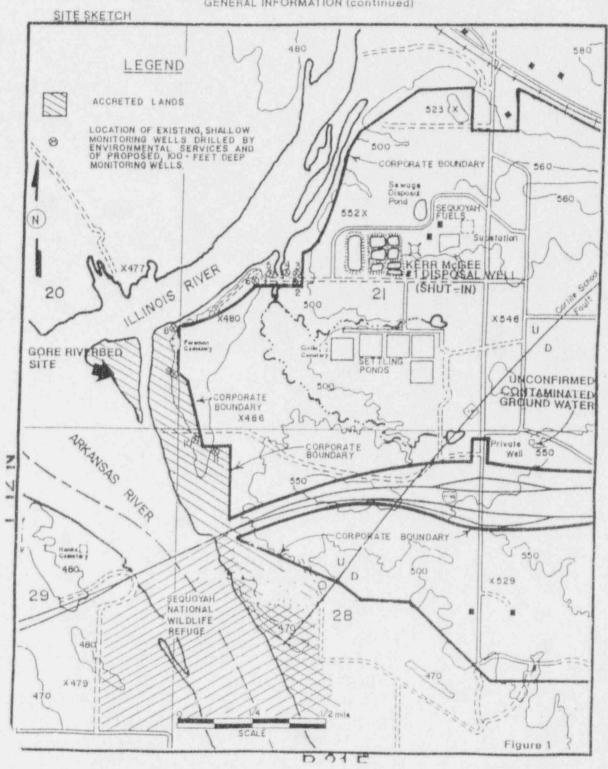
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Enclosure

CC/er

Site Name: Date:

### GENERAL INFORMATION (continued)



## SURFACE SOILS (0-6 INCHES) INORGANIC ANALYTIC RESULTS

Contanniamum         Station         CRDL         Station	ANALYTE					00	CONCENTRATION (MG/KG)	ATION (N	(G/KG)					
16400   40   27,600   25,400   27,100   14,500   29,300   8,530   7,500   7,500   7,500   8,070   14,1   1   1   1   1   1   1   1   1   1	Contaminant	Station 1 (Background)	CRDL	Station	Station	Station	Station	Station	Station	Station	Station	Station	Station	Station
ND   12	Aluminum	16.400	40	003.77	100 A 20	201100	0	6	10	11	12	13	14	tr)
Hard   Fig.   Hard	Andmony	5	01.	KITY KITY	W+.C3	27.100	14.500	22,300	8.530	7,500	7,350	4.910	8.070	8 300
110	Arsenic	4.1	7.7	200	ON THE	QN	Q.	DS	ND ND	R	ON.	QN	CN.	CN
10	Rarium	110	4	7.7	かりが目	ON	3.0	4.7	5.1	ND ON	CN	CN	CIN CIN	E E
ND	Barylline	011	40	180	158	70	52	94	56	986	170	20	UND Cal	S
Name	C-d-inn			1		1	S	1	EN	5	CIA CIA	200	100	10
1,530   1,000   2,260   2,550   2,570   2,50   802   1,280   990   2,780   5,180   6,13     1,530   1,000   2,260   2,540   2,570   2,59   2,3   19   13   10   7   12     1,500   2,500   2,3400   2,1800   1,5000   1,580   9,53   2,040   8,13   1,110   1,520   1,180	CAUMUM	ON.		ON O	CN	N ON	CN	CN	CN	EN CEN	CAN CHANGE	ON.	ON	ON.
29         2         41         40         29         23         10         1.280         920         2.780         923         613           7         10         12         11         7         3         ND         4         11         10         7         12           14.100         5         2.2         9         8         3         6         3         4         11         10         7         12           14.100         20         2.3,400         21,800         13,000         12,800         28,600         9,730         6,240         5,400         5,300           1.390         1,000         2,300         2,560         2,220         953         2,040         815         1,110         1,520         5,400         5,300           1.390         1,000         2,300         2,560         2,220         953         2,40         8,13         7,1         7,6         14         ND         <	Calchum	1.530	1.000	2,260	2.360	2 570	250	000	2000	CN	ND	ND	ND	S
7         10         12         11         7         3         ND         4         3         11         10         7         12           14.100         2         22         9         8         3         ND         4         3         3         ND         ND         ND           14.100         20         23.400         21.800         13.000         12.800         28.600         9.730         6.270         6.940         5.400         8.300           13.90         1.000         2.300         2.360         2.220         953         2.040         815         1.110         1.520         5.300           736         3         690         1.150         180         115         169         269         285         459         2.70         5.30           12         8         29         17         20         ND	Съготиш	29	CI	21	40	200	32	100	1.280	060	2,780	923	613	613
7         5         22         9         8         3         ND         4         3         3         ND         ND         ND           14.100         20         23,400         21,800         13,000         12,800         28,600         9,730         6,270         6,940         5,400         5,300           23         1         22         15         11         8.9         8,600         1,110         4         ND         6,270         6,940         5,400         5,300           736         3         690         1,150         180         115         169         269         2,300         5,30	Cobalt	1-	10	12	1 5	1	24	61			10	1	12	12
14,100   20   23,400   21,800   13,000   12,800   81,600   9,730   6,240   6,940   5,400   5,300     1,390   1,000   2,360   2,560   2,220   953   2,040   815   1,110   1,520   3,003     1,390   1,000   2,380   1,150   1,80   1,15   169   269   285   459   2,70   2,19     1,280   1,000   2,800   3,640   2,930   1,290   2,080   1,110   1,530   1,840   903   931     ND   2   ND   ND   ND   ND   ND   ND	Copper	7	W.	22	0	0	2	ON	4	(0)	m	N O	ND	S
23         1         22         11.800         13.800         28.600         97.30         6.270         6.940         5.400         5.300           1,390         1,000         2,300         2,250         2,220         953         2,040         815         1,110         1,450         7.1           736         3         690         1,150         1,220         953         2,040         815         1,110         1,520         .003         7.1           ND         0.1         ND         ND         ND         ND         ND         ND         ND         ND         ND         1,110         1,520         2,03         7.1         7.6         1,46         5.3         7.1         7.6         1,11         1,520         .003         9.3         7.1         7.6         1,11         1,520         .003         2.19         7.1         7.6         1,69         2.85         459         2.70         2.19         7.1         7.6         1,69         2.85         459         2.70         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1         7.1	Jon	14 100	000	72 400	21 000	000	0	0	60	4	11	¥	CN	E
1,390   1,000   2,300   2,560   2,220   953   2,040   815   1,110   1,520   .003   651     1,390   1,000   2,300   2,560   2,220   953   2,040   815   1,110   1,520   .003   651     ND	the day	73	2	201.07	-1.00v	13,000	12,800	28.600	9.730	6.270	6.940	\$ 400	5 300	0.05 >
1.55	dagmentum.	1 200	1 000	77	13	11	8.0	00.3	7.1	7.6	14	2 3	20000	3.50
Table   Tabl	ASSESSION OF THE STREET	1,290	1,000	2,300	2,560	2,220	953	2,040	\$15	1 110	000	0.00	1.1	1.1
ND         0.1         ND	Manganese	136	rr,	069	1.150	180	115	1 40	070	1,110	0.201	003	651	651
12   8   29   17   20   ND   ND   ND   ND   ND   ND   ND   N	fercury	N)	0.1	N ON	E.	E	CEN CEN	TO A	507	087	459	270	219	219
The column   The	Vickel	12	00	20	1.1	000	TANK.	IND	QN	R	0.2	R	B	S.
ND         1         ND         ND </td <td>otassium</td> <td>2.180</td> <td>1 000</td> <td>3 800</td> <td>3 6.40</td> <td>020 0</td> <td>ON.</td> <td>QN</td> <td>n</td> <td>3</td> <td>5</td> <td>m</td> <td>Q.</td> <td>E</td>	otassium	2.180	1 000	3 800	3 6.40	020 0	ON.	QN	n	3	5	m	Q.	E
ND         2         ND         ND </td <td>elenium</td> <td>QN</td> <td>gless</td> <td>E</td> <td>- CN</td> <td>VEZ S</td> <td>87.7</td> <td>7.080</td> <td>1.110</td> <td>1.530</td> <td>1.840</td> <td>903</td> <td>931</td> <td>931</td>	elenium	QN	gless	E	- CN	VEZ S	87.7	7.080	1.110	1.530	1.840	903	931	931
S2   1,000   229   228   248   90   251   93   85   82   68   88   88   88   88   88   88	liver	ON	2	100	2	GN.	CN	ON	2	£	R	- Q	5	5
ND         10         53         46         34         29         251         93         85         82         68         88           30         10         53         46         34         29         38         19         16         17         14         10         ND         ND         ND         ND         ND         ND         ND         14         10<	odium	68	1 000 1	000	ON	ON S	ON	CN.	- Q	2	Q.	CN	E	CIN
30 10 53 46 34 29 38 19 16 1- 14 10 14 10 14 10 ND	hallium	CIN	000:	2-7	077	748	8	251	93	500	8.2	68	00	000
A8 4 89 61 41 21 25 17 14 10 14 10 14 ND	aradinem.	30	100	ON	ON	Q.	Q.	日	2	E	5	3	00	99
ND   5 ND   ND   ND   ND   ND   ND   N	THE PROPERTY OF THE PARTY OF TH	30	01	53	46	34	29	38	10	1	1 1 1	0.	TOTAL	ON.
ND S ND	ATTIC AND ADDRESS OF THE PERSON OF THE PERSO	48	4	58	61	41	21	21	35		7 00	77	14	14
	VZDIGE	ON	5	- Q	- Q	2	- CN	E	162		000	11	16	16

Background > CRDL, Hit 3 times background

# SURFACE SEDIMENTS (0-6 INCHES) INORGANIC ANALYTIC RESULTS

The second name of the last of						COLOR INTERIOR (MIGING	STITE	(MG/DE)						
Contaminant	Station 1 (Background)	CRDL	Station 3	Station 4	Station 5	Station 6	Station	Station	Station	Station 10	Station	Station 12	Station	Station
Aluminum	13,600	40	17,800	20,400	8,180		29,100	20.200	17.800	19,100	14 800	12 500	7 450	7 160
Antimony	ND ND	CH.	ND ND	ND	ON.		R	ND	ON	S S	QN	N CN	E CN	CN
Arsenic	Q	2	3.7	3.2	5.7		3.6	R	R	N	S	CN	S	E
Barnum	75	40	100	107	50		186	117	133	115	110	88	53	51
Bervlium			1		+11		1		1	1			- Q	CN
Cadmuum	8	1	QX.	ND	QN		2	N N	ON	R	N	CZ	E	16
Calcium	1.330	1.000	1,450	1.020	761		1.960	1.650	1.970	1.900	1.820	1 740	2 320	2 130
Chromium	27	2	26	34	27		43	31	25	29	22	10	11	13
Cobalt	V)	10	9	9	4		6	9	9	9	9	4	7	- CN
Copper	47	5	7	9	m		10	000	7	90	7	8	7	N CN
Iron	10.500	20	11.200	13,400	13,200		17,700	13.500	12,700	13.600	12.700	10 600	6 890	6 810
Lead	7.5		11.6	8.9	60		14.7	14.0	11.8	40	11.6	8.0	5.5	47
Magnesium	1,210	1.000	1.380	1.760	623		2,120	1.540	2.510	2.460	1 980	2,650	OFU C	1 730
Manganese	180	16)	248	374	192		15 Abb. 3	271	009	371	444	258	178	237
Mercury	2	0.1	ON	2	ND		N N	NO.	NO.	ON	N.	15	62	CIN
Nickel	O.	000	10	1.1	S		13	10	000	0	ox.	2		9 6
Potzssium	0.66.1	1.000	2,480	3,130	1,140		3.950	2,700	3.010	3 370	OFF C	2 190	1.000	1 290
Selenuum	Q		0.4	R	0.4		N	9.0	R	N	CN.	0.4	0.5	0.6
Silver	2	7	D.	ND	DN O		N N	N N	B	NS.	R	EN CN	15	N.O.
Sodium	175	1.000	12.	158	100		186	134	180	171	125	155	140	157
Linalitum	ON		Q.	NO.	ND		N ON	ND	R	S	S	E	E	CN
Vanadium	26	10	150	36	21		50	36	33	34	28	24	3.	15
Zinc	32	41	4.1	41	24		57	67	43	49	37	30	380	25
T Transfer of the														

Background > CRDL, Hit 3 times background

### GROUND WATER INORGANIC ANALYTIC RESULTS

Contaminant   Station   Crol   Station   Sta	ANALYTE	(1)					CONCENTRATION (UG/L)	ATTON (U	G/L)				
Name	Contaminant	-	CRDL	Station 2	7 70 1	Station 4	Station	Station	Station	Station	Station	Station	Station
ND   60	Aluminum	85200	200	82,300	F. 18	908.000	8-299,000	128,000	1-327 000 - c	13.400	170 000	4.5	II II
ND   10	Antimony	DQ.	060	ON		399	106	S	100	CAN CAN	2000	- COLORAGO	407.00%
Size   200   773   427   55.2910   9   1360   861   3.160   1.770   1.	Arsenic	S	10	Q.	1	ON.	2	2	3 5	CENT CONTRACTOR	200	\$ 1	132
7         5         7         5         5         7         5         5         1700         ND	Anum	835	200	773	1	E - 010 C -	H 1 380	26.3	031.6	ON.	OV.	Q	Q.
NID   5   NID	keryllium	7	4	7	1	5,8	12.	9 66	2,100	1.770	17.70	18830	12381
11,300   5,000   34,900   49,700   1140,000   29,200   28,400   97,800   143,000   73,400   71,203,000   100   10   90   65   11,790   25,54   194   321   165   172   172,030   172,030   100	admium	ON.	100	ON		CN	N CN	95	017	7 (	~	122 28	177
100   10   90   65   1.790   2 - 554   194   321   165   1.12   1.20000     45B   50   20   ND   1.516.040   4-433.040   110.000   308.000   138.000   148.000   1.20000     85.900   100   78.100   67.100   1.516.040   4-433.040   110.000   308.000   138.000   148.000   148.000   1.20000     85.900   100   78.100   67.100   1.516.040   4-433.040   110.000   308.000   138.000   148.0	alcium	31,300	5.000	34,900	40 700	- 000 0712	000 -00	100 A OC	4	ON .	02	ON	Q .
45B         50         20         ND         *556         3.24         194         521         165         17.2         *335           45         25         29         26         680         -43         136         166         17.2         *340           85.900         100         78.100         67.100         1.510.000         *43         136         166         43         *236           64         5         20         26         680         *43.500         110.000         308.000         188.000         *48.000         *327.000           64         5         50         32         78         72         46         177         46         177           13.800         5.000         18.600         38.500         *261.000         5.00         380.00         148.00         *327.000           3.10         0.2         ND         ND         ND         ND         ND         ND         *46         177         46         177           13.800         1.5         ND         ND         ND         ND         ND         ND         ND         *320         *320         *320         *320         *320         *320	hromium	100	10	00	65	1 760	25.4	20.40	+	143,UNO	73.4(30	120300	1-134.000
45         25         29         26         680 -	obalt	45B	50	20	C.N	7554	# 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	200	-	165	1.52	. 335	563
85.900 100 78.100 67.100 1.510.000 = 433.000 110.000 308.000 138.000 148.000 5.377.000 138.000 18.600 38.500 - 261.000 5.070 18.600 18.600 18.500 145.00 5.070 18.600 18.600 18.500 145.00 5.070 18.6000 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.6000 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.6000 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.600 18.6000 18.600 1	CONSET	45	25	30	20	Day 007	100	0.00	-	56	(F)	=240	三 1625
13.800   1.00   76.100   1.510.000   1.450   1.10.000   1.10.000   138.000   138.000   148.000   1.277.0000   1.177   1.1780	000	0000 20	1000	20.00	07	080	178	43	-	108	71	208	1-237
13.800   5.000   18.600   38.500   -261.000   -2.74.600   19.900   -66.500   -3.220   -3.2700   -2.67.700   -2.6	200	00.50	8	/8.100	67,100	1.510.000 =	=433,000	110,000	-	138,000	148,000	- 377 000-	OWE ZZZ
3.800   5,000   18,600   38,500   -261,000   -274,600   19,900   -66,500   -257,600   -24,900   -26,300   -27,700	CSO	3	0	50	32	. 367	50	90	-	77	2K	CT.	1774
3.510 15 1,780 1,450 13,500 5,070 3,900 5,41,700 5,220 3,230 5,300 5,300 15,900 15,700	lagnesium.	13,800	5,000	18,600	38,500	- 261,000 -	74,600	19,900		- 60A-TA	44.000		1/4
ND         0.2         ND         ND         0.46         ND         ND         ND         0.28         ND         ND         0.33           78         40         48         39         5.1760         433         146         271         115         14         7.140         0.33           13,900         5.000         15.900         11.700         73.106         34.700         15.700         31.900         27.100         19.300         33.300           ND         ND<	anganese	3.510	15	1,780	1.450	13,500%	5 070	3 600	1	Tanation C	1000	000,000	7.0000
78         40         48         39         5.1.760         433         146         271         115         115         14         7.742         1.25         1.24         7.742         1.25         1.24         7.742         1.25         1.24         7.742         1.25         2.21         2.22         2.22 <td>fercury</td> <td>S</td> <td>0.2</td> <td>S</td> <td>ON</td> <td>0.46</td> <td>CZ</td> <td>NTO</td> <td>4</td> <td>3.440</td> <td>20030</td> <td>1007.700</td> <td>8.670</td>	fercury	S	0.2	S	ON	0.46	CZ	NTO	4	3.440	20030	1007.700	8.670
13,900   5,000   15,900   11,700   73,100   34,700   15,700   31,900   27,100   19,300   33,300   33,300   ND   ND   ND   ND   ND   ND   ND	tokel	78	40	25.50	30	. U92 E	423.5	200	-	ON	OZ	0.33	0.41
ND   5	otzssium	13 900	5 000	15 900	11 200	27 100	455	140	1	115	77	7. 422	3005
ND   10   ND   ND   ND   ND   ND   ND   ND   N	e emitten	5	*	NEW NEW	M. 1.00	13.100 =	34.700	15.700	-	27,100	19,300	33,300	1743.300
17.300   5.000   6.240   185.000   356.000   13.100   16.200   14.000   19.300   16.900   10.000   10.300   1	drian.	CLX	0.	ON	CN	ON	ON NO	S	-	2	NO.	QN	E
11.500   5,000   6,240   185,000   3 30,000   13,100   16,200   14,000   19,300   16,900   16,900   10	II VCI	ON!	2002	ON	ND	ND ND	R	QN	-	R	ON	E	16
ND   10 ND   ND   ND   ND   ND   ND   ND   ND	Schulle	17.300	2.000	6.240	185.000	356,000	330,000	13.100	-	14,000	10 300	16 000	13 500
115 50 124 84 -1.560 195 417 2 225 195 -519 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	กลานยาก	ND	10	S	ON ON	DQ.	ND.	EN.	-	EN	100	NO. TOTAL	3000
340 20 253 220 - 6.300 7 1.540 334 985 444 472 991 ND	anadium	115	50	124	84	1.560	521-	104	Laur	375	3171	2000	N. C.
ND 10 ND ND NN	inc	340	20	253	220	- 6.300	1.540	334	1	444	200	2003	
	vanide	ON .	10	2	R	Q.	EX	CZ.	-	NEW YEAR		271	1.300

Background > CRDL, Hit 3 nmes background

X

Background flagged B (> IDL < CRDL), Hit 3 times background